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Attorneys for Defendants

ALDERWOODS GROUP, INC., PAUL A.
 HOUSTON, SERVICE CORPORATION
 INTERNATIONAL, SCI FUNERAL AND
 CEMETERY PURCHASING COOPERATIVE, INC.,
 SCI EASTERN MARKET SUPPORT CENTER, L.P.,
 SCI WESTERN MARKET SUPPORT CENTER, L.P.
 a/k/a SCI WESTERN MARKET SUPPORT CENTER, L.P.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CLAUDE BRYANT, CRAIG FULCHER,
 SANFORD LEVINE and THOMAS
 THOMPSON et al., on behalf of themselves
 and all other employees and former employees
 similarly situated,

Plaintiffs,

vs.

ALDERWOODS GROUP, INC., PAUL A.
 HOUSTON, SERVICE CORPORATION
 INTERNATIONAL, SCI FUNERAL AND
 CEMETERY PURCHASING
 COOPERATIVE, INC., SCI EASTERN
 MARKET SUPPORT CENTER, L.P. SCI
 WESTERN MARKET SUPPORT CENTER,
 L.P. a/k/a SCI WESTERN MARKET
 SUPPORT CENTER, INC., SCI HOUSTON
 MARKET SUPPORT CENTER, L.P., and
 JOHN DOES 1-3, et al.

Defendants.

No. 3:07-CV-5696-SI

**DECLARATION OF ROBERT PISANO
 IN SUPPORT OF SCI EASTERN
 MARKET SUPPORT CENTER, L.P.
 MOTION TO DISMISS AMENDED
 COMPLAINT PURSUANT TO FRCP
 12(b)(2) AND FRCP 12(b)(6)**

1 I, Robert Pisano, hereby specially appear in this matter for the sole purpose of
2 moving to dismiss the Amended Complaint and, in support of that motion, submit the
3 following declaration under penalty of perjury:

4 1. I am a resident of Eastchester, New York.

5 2. I work with the SCI Eastern Market Support Center, L.P. ("Eastern Market
6 Support"). I make this declaration based upon my own personal knowledge. If called
7 upon to testify about the matters set forth herein, I could and would do so.
8

9 3. Eastern Market Support's office is located in Long Island City, New York.

10 4. Eastern Market Support has never been licensed or conducted business in
11 the State of California. It provides executive, management, administrative, accounting,
12 data processing, and human resources services to the funeral establishments,
13 cemeteries and other local facilities owned by Service Corporation International's ("SCI")
14 subsidiary companies that are located in the following states: Connecticut, Illinois, Iowa,
15 Maine, Maryland, Michigan, Minnesota, Nebraska, New Hampshire, New Jersey, New
16 York, Ohio, Pennsylvania, Rhode Island, Virginia, Massachusetts, District of Columbia,
17 Indiana, Wisconsin and Vermont.
18

19 5. At no time did Eastern Market Support provide any such services within the
20 State of California or to any business entity doing business in the State of California.
21

22 6. Eastern Market Support has never entered into any contracts, employment
23 or otherwise, with any of the plaintiffs in this action. It never employed or supervised the
24 employment of any of the plaintiffs in this action.
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26 7. Eastern Market Support has never maintained an office or held any bank
27 accounts located within the State of California.
28

1 8. Eastern Market Support has not owned any real property in the State of
2 California.

3 9. Eastern Market Support has not paid any taxes to the State of California.

4 I declare under penalty of perjury under the laws of the United States of America
5 that the foregoing is true and correct. Executed this 26 day of March, 2008, at
6 Long Island City, New York.
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10 ROBERT PISANO
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